

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE: ) BANKRUPTCY CASE  
          ) )  
CASSANDRA JOHNSON LANDRY, ) NO.: 18-55697-LRC  
aka Cassandra Landry      ) )  
                                ) CHAPTER 13  
Debtor.                     ) )  
                               ) )  
                               ) )  
                               ) )  
                               ) )

OBJECTION TO CONFIRMATION

COMES NOW JPMorgan Chase Bank, National Association (hereinafter known as "Creditor"), a secured creditor holding a Security Deed against the real property commonly known as 869 Natchez Valley Trace, Grayson, GA 30017 (the "Property"), and for the reasons stated below, objects to confirmation of Debtor's Chapter 13 plan (Doc. No. 19) (the "Plan").

1.

Debtor's Plan fails to provide for payment of the pre-petition arrearage owed to Creditor under the terms of the Note and Security Deed signed by the Debtor. The amount of the pre-petition arrearage owed to Creditor is estimated to be \$65,789.64. .

2.

Debtor claims that fraud was committed regarding all mortgages she is obligated for. Debtor lists the Chase loan as "unliquidated" on Schedule D. Creditor requests the Plan and Schedules be amended to properly treat Creditor's property.

WHEREFORE, Creditor prays that the Court will:

1. Deny confirmation,
2. Award reasonable attorney's fees, and
3. Grant such other and further relief as is just and equitable.

*/s/John D. Schlotter*

---

John D. Schlotter  
GA BAR NO. 629456  
Attorney for Creditor  
McCalla Raymer Leibert Pierce, LLC  
1544 Old Alabama Road  
Roswell, GA 30076  
678-281-6453  
John.Schlotter@mccalla.com

## CERTIFICATE OF SERVICE

I, John D. Schlotter, of MCCALLA RAYMER LEIBERT PIERCE, LLC, 1544 Old Alabama Road, Roswell, Georgia 30076-2102, certify:

That I am, and at all times hereinafter mentioned, was more than 18 years of age;

That on the date below, I served a copy of the within OBJECTION TO CONFIRMATION filed in this bankruptcy matter on the following parties at the addresses shown, by regular United States Mail, with proper postage affixed, unless another manner of service is expressly indicated:

Cassandra Johnson Landry  
869 Natchez Valley Trace  
Grayson, GA 30017

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on: 4/30/2018 By: /s/John D. Schlotter  
(date) John D. Schlotter  
Georgia BAR NO. 629456  
Attorney for Creditor